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November 14, 2024

Via ECF

Judge Edward S. Kiel
United States District Court
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: J.G. v. Jones
United States District Court, District of New Jersey
Civ No. 24-cv-08232

Dear Judge Kiel,

Our office represents the plaintiff, J.G. I write this letter to request an extension of time to serve the defendant pursuant to Fed. R. Civ Pro. 4(m). Plaintiff commenced this action on August 2, 2024 (DE 1) and the summons was issued that same day (DE 3). On August 6, 2024 our office retained a process server to serve defendant. Initially we sent the process server to the address Mr. Jones provided the Glassboro Municipal Court when he was arrested on August 19, 2024 (Exhibit 1). However, our process server alerted us that Mr. Jones no longer resided at that location (Exhibit 2).

On August 12, 2024, we provided the process server with another address associated with Mr. Jones, and on August 20, 2024, we were informed once again that he was unable to be served at the location (Exhibit 3). On September 9, 2024, I sent Mr. Jones a Notice of Lawsuit and Request to Waive Service of Summons package. However, Mr. Jones did not respond.

We became aware that Mr. Jones is now residing at 2442 N Lee St, Philadelphia, PA 19125. On October 28, 2024, we hired a process server to serve the defendant, but once again the process server was unable to effectuate service (Exhibit 4). Despite the fact the process server claimed she was unable to serve the Defendant at the address, on October 30, 2024 Mr. Jones was served with a copy of the complaint at the same address (Exhibit 5). However, it has come to our attention that the person serving the paperwork neglected to include a copy of the summons.

We therefore are requesting additional time to serve the defendant pursuant to F.R.C.P. 4(m).

Thank you very much in advance.

Respectfully submitted,

/s/*Daniel Szalkiewicz*
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